ELIZABETH M. PIPKIN (243611)
ANN M. RAVEL (62139)
McMANIS FAULKNER
50 West San Fernando Street, 10th Floor
San Jose, CA 95113
Telephone: (408) 279-8700
Facsimile: (408) 279-3244
epipkin@mcmanislaw.com
aravel@mcmanislaw.com

GLEN E. SUMMERS (176402)
KARMA M. GIULIANELLI (184175)
LINDLEY J. BRENZA (*pro hac vice*)
JONATHAN JACOB MARSH (*pro hac vice*)
BARTLIT BECK LLP
1801 Wewatta Street, Suite 1200
Denver, CO 80202
Telephone: (303) 592-3100

MARC A. WALLENSTEIN (*pro hac vice*)
GEORGE A. ZELCS (*pro hac vice*)
RYAN Z. CORTAZAR (*pro hac vice*)
CHAD E. BELL (*pro hac vice*)
PAMELA I. YAACOUB (*pro hac vice*)
KOREIN TILLERY LLC
205 North Michigan Avenue, Suite 1950
Chicago, IL 60601
Telephone: (312) 641-9750
Facsimile: (312) 641-9751

CAROL L. O'KEEFE (*pro hac vice*)
MICHAEL E. KLENOV (277028)
KOREIN TILLERY LLC
505 North Seventh Street, Suite 3600
St. Louis, MO 63101
Telephone: (314) 241-4844
Facsimile: (314) 241-3525

*Attorneys for Plaintiffs Joseph Taylor,
Edward Mlakar, Mick Cleary,
Eugene Alvis, and Jennifer Nelson*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JOSEPH TAYLOR, EDWARD MLAKAR, MICK CLEARY, EUGENE ALVIS, and JENNIFER NELSON, individually and on behalf of all others similarly situated, Plaintiffs, v. GOOGLE LLC, Defendant.	Case No. 5:20-CV-07956-VKD **DECLARATION OF KARMA M. GIULIANELLI IN SUPPORT OF PLAINTIFFS' OPPOSITION TO GOOGLE LLC'S MOTION TO EXCLUDE TECHNICAL ANALYSES** Date: July 22, 2025 Time: 10:00 a.m. Judge: Hon. Virginia K. DeMarchi

DECLARATION OF KARMA M. GIULIANELLI IN SUPPORT OF PLAINTIFFS' OPPOSITION TO
GOOGLE LLC'S MOTION TO EXCLUDE TECHNICAL ANALYSES (CASE NO. 5:20-CV-07956)

I, Karma M. Giulianelli, declare as follows:

1.   I am an attorney at Bartlit Beck LLP, co-counsel to Plaintiffs and putative class representatives Joseph Taylor, Edward Mlakar, Mick Cleary, Eugene Alvis, and Jennifer Nelson. I make this declaration in support of Plaintiffs' Opposition to Google LLC's Motion to Exclude Technical Analyses. I have personal knowledge of the facts stated in the declaration and, if called as a witness, I could and would competently testify thereto.

2.   Attached as Exhibit 1 is a true and correct copy of the Expert Report of Dr. Jeffery A. Stec dated November 12, 2024.

3.   Attached as Exhibit 2 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00010605.

4.   Attached as Exhibit 3 is a true and correct copy of excerpted pages of the Deposition of Chris Thompson, taken December 12, 2024.

5.   Attached as Exhibit 4 is a true and correct copy of the Updated Scripts and Data for the Expert Report of Christopher Thompson, dated December 22, 2024.

6.   Attached as Exhibit 5 is a true and correct PDF copy of the "Active Device Data Analysis" spreadsheet produced to Google as part of the Updated Scripts and Data for the Expert Report of Christopher Thompson. Plaintiffs are prepared to produce a native Excel copy upon request of the Court.

7.   Attached as Exhibit 6 is a true and correct copy of excerpted pages of the Deposition of Chris Thompson, taken January 6, 2025.

8.   Attached as Exhibit 7 is a true and correct copy of excerpted pages of the Deposition of Iglikov, taken December 5, 2024.

9.   Attached as Exhibit 8 is a true and correct copy of excerpted pages of the Deposition of Christof Klausecker, taken July 2, 2024.

10.   Attached as Exhibit 9 is a true and correct copy of the Second Updated Calculations of the Expert Report of Jeffrey A. Stec, Ph.D., dated January 20, 2025.

DECLARATION OF KARMA M. GIULIANELLI IN SUPPORT OF PLAINTIFFS' OPPOSITION TO GOOGLE LLC'S MOTION TO EXCLUDE TECHNICAL ANALYSES (CASE NO. 5:20-CV-07956)

11.   Attached as Exhibit 10 is a true and correct copy of an email exchange between Max Bernstein and Jacob Marsh dated January 29, 2025.

12.   Attached as Exhibit 11 is a true and correct copy of the Expert Report of Christopher Thompson, dated October 16, 2024.

13.   Attached as Exhibit 12 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00010453.

14.   Attached as Exhibit 13 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00010448.

15.   Attached as Exhibit 14 is a true and correct copy of Amir M. Ahmadzadeh et al., *Influence of overhead on LTE downlink performance: a comprehensive model*, 67 TELECOMMUN SYST 485- 517 (2018)

16.   Attached as Exhibit 15 is a true and correct copy of the Data Appendix to the Expert Report of Dr. Douglas C. Schmidt, dated January 9, 2023.

17.   Attached as Exhibit 16 is a true and correct copy of excerpted pages of the Deposition of Roger Entner, dated October 31, 2024.

18.   Attached as Exhibit 17 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00023499.

19.   Attached as Exhibit 18 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00008092.

20.   Attached as Exhibit 19 is a true and correct copy of the Supplemental Expert Report of Kevin Jeffay, dated February 19, 2025.

21.   Attached as Exhibit 20 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00008277.

22.   Attached as Exhibit 21 is a true and correct copy of excerpted pages of the Deposition of Sundeep Sancheti taken June 2, 2021.

23.   Attached as Exhibit 22 is a true and correct copy of the Expert Report of Douglas Leith, dated October 15, 2024.

DECLARATION OF KARMA M. GIULIANELLI IN SUPPORT OF PLAINTIFFS' OPPOSITION TO GOOGLE LLC'S MOTION TO EXCLUDE TECHNICAL ANALYSES (CASE NO. 5:20-CV-07956)

24.   Attached as Exhibit 23 is a true and correct copy of excerpted pages of the Deposition of Kevin Jeffay taken April 1, 2025.

25.   Attached as Exhibit 24 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00013065.

26.   Attached as Exhibit 25 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00049286.

27.   Attached as Exhibit 26 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00026635.

28.   Attached as Exhibit 27 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00043524.

29.   Attached as Exhibit 28 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00026725.

30.   Attached as Exhibit 29 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00024861.

31.   Attached as Exhibit 30 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00049352.

32.   Attached as Exhibit 31 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-0030368.

33.   Attached as Exhibit 32 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00024815.

34.   Attached as Exhibit 33 is a true and correct copy of the Expert Report of Kevin Jeffay dated February 19, 2025.

35.   Attached as Exhibit 34 is a true and correct copy of excerpted pages of the Deposition of Dr. Jules White taken November 8, 2024.

36.   Attached as Exhibit 35 is a true and correct copy of a document produced by Google in this litigation with Bates-label beginning with GOOG-CSUPO-00029286.

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37.   Attached as Exhibit 36 is a true and correct copy of excerpted pages of the Deposition of Noha Elarief taken December 12, 2024.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 7, 2025.

Dated: May 7, 2025   /s/ *Karma M. Giulianelli*
                                                      Karma M. Giulianelli

DECLARATION OF KARMA M. GIULIANELLI IN SUPPORT OF PLAINTIFFS' OPPOSITION TO GOOGLE LLC'S MOTION TO EXCLUDE TECHNICAL ANALYSES (CASE NO. 5:20-CV-07956)